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A. OBJECT OF THE CONSPIRACY

UNITED STATES OF AMERICA,

MANUEL CUANRIQUEZ,

aka "Serio,"

aka "Wacky," and JOSE GUADALUPE HERNANDEZ,

Beginning on a date unknown, and continuing to on or about May 16, 2012, in Los Angeles County, within the Central District of California, and elsewhere, defendants MANUEL CUANRIQUEZ, also known as ("aka") "Wacky" ("CUANRIQUEZ"), and JOSE GUADALUPE HERNANDEZ, aka "Serio" ("HERNANDEZ"), and others known and SL: VOCS

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CLERK U.S. DISTRICT COURT CENTRAL DIST. OF CALIF. LOS ANGELES

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2011 Grand Jury

No. CR2-12 00543

INDICTMENT

[21 U.S.C. § 846: Conspiracy to Distribute Methamphetamine; 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii): Distribution of Methamphetamine; 18 U.S.C. § 2: Aiding and Abetting]

The Grand Jury charges:

Plaintiff,

Defendants.

v.

COUNT ONE

[21 U.S.C. § 846]

unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally distribute at least 50 grams of methamphetamine, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

- 1. Defendant CUANRIQUEZ would obtain methamphetamine to sell to customers.
- 2. Defendant HERNANDEZ would assist defendant CUANRIQUEZ during the sale of the methamphetamine to customers.

C. OVERT ACTS

In furtherance of the conspiracy and to accomplish the object of the conspiracy, defendants CUANRIQUEZ and HERNANDEZ, and others known and unknown to the Grand Jury, committed various overt acts, on or about the following dates, within the Central District of California, and elsewhere, including, but not limited to, the following:

- 1. On September 28, 2009, defendant CUANRIQUEZ told a confidential government informant ("CI") that CUANRIQUEZ could obtain a quarter-pound of methamphetamine to sell to the CI and that it was good quality methamphetamine.
- 2. On September 29, 2009, defendant CUANRIQUEZ, using coded language in a telephone conversation, arranged to meet with the CI once CUANRIQUEZ had obtained the methamphetamine from his source of supply.

- 4. On September 29, 2009, defendant CUANRIQUEZ provided methamphetamine wrapped in cellophane to the CI and unwrapped the methamphetamine so that the CI could inspect the methamphetamine.
- 5. On September 29, 2009, defendant HERNANDEZ took out additional cellophane so that the methamphetamine could be rewrapped once the CI had inspected the methamphetamine.
- 6. On September 29, 2009, defendants CUANRIQUEZ and HERNANDEZ re-wrapped the methamphetamine once it was examined by the CI so that it could be distributed to the CI in exchange for payment.
- 7. On September 29, 2009, defendant CUANRIQUEZ accepted approximately \$3,800 from the CI in exchange for the methamphetamine.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii); 18 U.S.C. § 2]

On or about September 29, 2009, in Los Angeles County,
within the Central District of California, defendants MANUEL
CUANRIQUEZ, also known as ("aka") "Wacky," and JOSE GUADALUPE
HERNANDEZ, aka "Serio," while aiding and abetting each other,
knowingly and intentionally distributed at least 50 grams, that
is, approximately 109.2 grams, of methamphetamine, a schedule II
controlled substance.

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14 ANDRÉ BIROTTE JR. United States Attorney

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Foreperson

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